

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELECTRONICALLY FILED
DOC#
DATE FILED: 10-24-2012

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In re REFCO INC. SECURITIES LITIGATION

:
Case No. 07-md-1902 (JSR)
:

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This Document Relates to:

-----X
KENNETH M. KRYS, *et al.*

:
Case No. 08-3065 (JSR)
:

Plaintiffs,

-against-

CHRISTOPHER SUGRUE, *et al.*,

Defendants.
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MOTION FOR *PRO HAC VICE* ADMISSION OF THOMAS A. GILSON

Pursuant to Local Civil Rule 1.3(c), undersigned counsel, a member in good standing of the bar of this Court, respectfully moves for an Order allowing the admission *pro hac vice* of:

Thomas A. Gilson
Beus Gilbert PLLC
4800 North Scottsdale Road, Suite 6000
Scottsdale, Arizona 85251
Tel. (480) 429-3000
Fax (480) 429-3100
Email: tgilson@beusgilbert.com

Mr. Gilson is a member in good standing of the bar of the State of Arizona. There are no pending disciplinary proceedings against Mr. Gilson in state or federal court. This Motion is based on the accompanying affirmation of David Molton and affidavit of Thomas A. Gilson and Certificate of Good Standing from the bar of the State of Arizona. A proposed Order is attached hereto.

Dated: New York, New York
September 19, 2012

Respectfully submitted,

By: 

David J. Molton

Brown Rudnick LLP

Seven Times Square

New York, New York 10036

Telephone: (212) 209-4800

Facsimile: (212) 209-4801

dmolton@brownrudnick.com

Co-Counsel to Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHRISTOPHER SUGRUE, <i>et al.</i> ,	:	
	:	
Defendants.	:	
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**AFFIRMATION OF DAVID MOLTON IN SUPPORT OF
MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE***

DAVID MOLTON declares as follows:

1. I am a partner of Brown Rudnick LLP, Seven Times Square, New York, New York 10036, co-counsel for plaintiffs Kenneth M. Kryes and Margot MacInnis as Joint Official Liquidators, Kenneth M. Kryes and Margot MacInnis, as assignees of claims, and The Harbour Trust Co. Ltd. as Trustee of the SPhinX Trust ("Plaintiffs"), in the above-captioned action.
2. I am a member in good standing of the bar of the State of New York and of the bar of this Court.
3. I make this affirmation in support of the application of Thomas A. Gilson, Esq. for admission to the bar of this Court *pro hac vice*.
4. An original affidavit from Mr. Gilson in support of his application for admission to the bar of this Court *pro hac vice* has also been filed with the Court.

5. I will be associated with Mr. Gilson in the prosecution of this matter, and I or another member or associate of Brown Rudnick LLP will file papers, enter appearances, and sign all pleadings, briefs and other papers to be filed with the Court as required by the Rules of this Court.

WHEREFORE it is respectfully requested that the motion to admit Thomas A. Gilson, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

Dated: New York, New York
September 19, 2012

Respectfully submitted,

By: 

David J. Molton
Brown Rudnick LLP
Seven Times Square
New York, New York 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801
dmolton@brownrudnick.com

Co-Counsel to Plaintiffs

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Defendants.	:	
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AFFIDAVIT OF THOMAS A. GILSON IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*

STATE OF ARIZONA)
) ss.:
COUNTY OF MARICOPA)

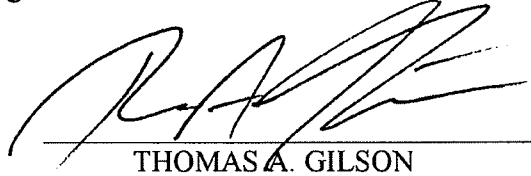
Thomas A. Gilson, being duly sworn, deposes and says:

1 I am an associate at the law firm of Beus Gilbert PLLC. I am eligible to practice and am a member in good standing of the bar of the State of Arizona. A Certificate of Good Standing from the bar of the State of Arizona is appended hereto. I have not been suspended or disbarred in any court, and am a member in good standing of every jurisdiction in which I have been admitted to practice.

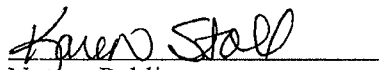
2. Plaintiffs Kenneth M. Kryz and Margot MacInnis as Joint Official Liquidators, Kenneth M. Kryz and Margot MacInnis, as assignees of claims, and The Harbour Trust Co. Ltd. as Trustee of the SPhinX Trust ("Plaintiffs"), have requested to be represented by me.

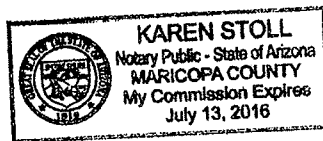
3. I understand that I am charged with knowing and complying with the Rules of this Court, including disciplinary rules, and with paying all required fees.

Based on the foregoing, I respectfully request admission to this Court for the purpose of appearing, arguing, and if necessary, trying the case on behalf of Plaintiffs.


THOMAS A. GILSON

Sworn to before me
this 10th day of September 2012

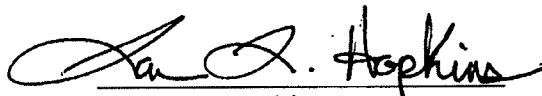

Notary Public



CERTIFICATE OF GOOD STANDING
ISSUED BY THE DISCIPLINARY CLERK
FOR AND ON BEHALF OF
THE SUPREME COURT OF ARIZONA

The Disciplinary Clerk pursuant to Rule 74, Rules of the Supreme Court of Arizona, hereby certifies that according to the records of the State Bar, **THOMAS ANDREW GILSON** was duly admitted to practice as an attorney and counselor at law in all courts of Arizona by the Supreme Court of Arizona on December 16, 2003 and is now, as of the date of this Certificate, an active member of the State Bar of Arizona in good standing.

Given under the seal of the Disciplinary
Clerk of the Supreme Court of Arizona
this August 31, 2012.

A handwritten signature in black ink, appearing to read "Laura L. Hopkins", written over a horizontal line.

Laura L. Hopkins
Disciplinary Clerk

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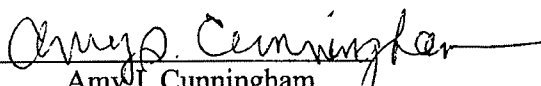
AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

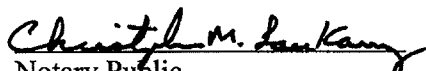
1. Amy J. Cunningham, being duly sworn, deposes and says: I am not a party to the within action, am over 18 years of age and am an employee of Brown Rudnick LLP, Seven Times Square, New York, New York 10036.

2. On the 19th day of September, 2012, I caused true and correct copies of (1) Motion for *Pro Hac Vice* Admission of Thomas A. Gilson, (2) Affirmation of David Molton in Support of Motion for Admission of Counsel *Pro Hac Vice*, (3) Affidavit of Thomas A. Gilson in Support of Motion

for Admission of Counsel *Pro Hac Vice* and (4) Proposed Order for Admission *Pro Hac Vice* of Thomas A. L. L. C. ? ? ?


Amy J. Cunningham

Sworn to before me this
17th day of September, 2012.


Notary Public

CHRISTOPHER M. LANKAMY
Notary Public, State of New York
No. 01LA6138897
Qualified in Kings County
Commission Expires December 27, 2013